

JEREMY STALLSWORTH)
Individually And On Behalf Of)
All Others,)
)
Plaintiffs,)
)
vs.) Case No.: 17-cv-4178-NKL
)
)
STAFF MANAGEMENT | SMX, et al.)
Defendant.)

Case 2:17-cv-04178-NKL Document 36 Filed 03/05/18 Page 1 of 3

6. On January 30, 2018, the Plaintiff filed a Motion to Reopen the Case and Extension of Time to Finalize Settlement.

7. This Court reopened this case on February 2, 2018 and granted the Plaintiff thirty days to file a Motion for Attorneys' Fees if the parties could not agree on the Plaintiffs' attorney's fees in this matter.

8. Plaintiff seeks compensation for no less than 38.1 hours worked and costs of \$187.47. The fees currently incurred break down as follows:

Brown – 22.4 hours worked at \$550 a hour totaling \$12,320.00;

Watkins – 10.5 hours worked at \$550 a hour totaling \$5,775.00; and

Graham – 5.2 hours worked at \$100 a hour totaling \$520.00.

Total fees currently incurred = \$18,615.00.

The cost of \$187.47 represents a \$107.47 filing fee and a service fee of \$80.00. No other costs are being requested at this time.

9. In conjunction with this Motion, Plaintiff will file a Memorandum in Support, Declarations of Attorneys C. Jason Brown and Jayson A. Watkins, itemized Time Records and a brief Firm Resume.

10. Plaintiff's counsel respectfully submits that this request is made in good faith and is based on an itemized record of work and request for reasonable attorneys' fees and costs. Counsel will submit an updated record of time at the conclusion of briefing but before any oral arguments granted by the Court

WHEREFORE, Plaintiff, Jeremy Stallsworth, moves the Court for an award of costs in the amount of \$187.47 and attorneys' fees in an amount not less than \$18,615.00, plus any additional fees incurred through the conclusion of this matter, pursuant to the settlement

agreement entered into by the parties and the Fair Credit Reporting Act, 15 U.S.C. §§
1681o(a)(2) & 1681n(a)(3).

Respectfully submitted,

By: /s/ C. Jason Brown
C. Jason Brown 49952
Jayson A. Watkins MO 61434
Brown & Watkins LLC
301 S. US 169 Hwy
Gower Missouri 64454
Tel: 816-505-4529
Fax: 816-424-1337
watkins@brownandwatkins.com
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of March, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

Thomas M. Martin MO # 38811
M. Cory Nelson MO # 63357
1010 Walnut, Suite 500
Kansas City, Missouri 64106
(816) 421-2500 (telephone)
(816) 472-2500 (facsimile)
tmmartin@lewisricekc.com
cnelson@lewisricekc.com

/s/ C. Jason Brown
Attorney for Plaintiff